

1 KEVIN V. RYAN (CSBN 118321)
2 United States Attorney

3 MARK L. KROTKOSKI (CSBN 138549)
4 Chief, Criminal Division

5 ANDREW P. CAPUTO (CSBN 203655)
6 Assistant United States Attorney

7 450 Golden Gate Avenue, Box 36055
8 San Francisco, California 94102-3495
9 Telephone: (415) 436-7004
10 FAX: (415) 436-7234

11 Attorneys for Plaintiff

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13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

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UNITED STATES OF AMERICA,)	No. CR 06-0375 SI
Plaintiff,)	STIPULATION AND [PROPOSED]
v.)	ORDER CONTINUING BRIEFING
JORGE ESTRADA,)	SCHEDULE AND MOTION HEARING
Defendant.)	Date: December 1, 2006
)	Time: 11:00 a.m.

The parties hereby stipulate as follows:

1. Defendant has filed a motion to suppress, which is currently scheduled for hearing
on December 1, 2006, at 11:00 a.m.

2. The government's opposition to the motion is currently due on November 17.

3. Last Thursday, government counsel learned that one of the three federal agents
present during the events at issue in the motion is currently in Thailand and will not return to
work in the United States until November 20 or 21.

4. To enable government counsel to speak with this currently absent agent before
preparing the government's opposition to the pending motion, the parties respectfully request that

STIPULATION AND [PROPOSED] ORDER CONTINUING BRIEFING SCHEDULE
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1 the Court extend the briefing schedule and hearing date on the motion as follows:

2 Government's Opposition to Motion: December 1, 2006

3 Defendant's Reply on Motion: December 8, 2006

4 Motion Hearing: December 15, 2006, at 11:00 a.m., or at such
5 other time convenient for the Court

6 5. Defendant is currently serving a 24-month sentence on a supervised-release
7 violation in a related case. As defendant is in custody serving this sentence, he will not be
8 prejudiced by a delay in these proceedings.

9 IT IS SO STIPULATED.

10 DATED: November 13, 2006

/s/

11 ANDREW P. CAPUTO
12 Assistant United States Attorney

13 DATED: November 13, 2006

/s/

14 ELIZABETH M. FALK
15 Assistant Federal Public Defender

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17 [PROPOSED] ORDER

18 For good cause shown, the briefing schedule and hearing on defendant's motion to
19 suppress are hereby continued as stated in the parties' stipulation. The hearing on the motion
20 will be held on December 15, 2006, at 11:00 a.m.

21 IT IS SO ORDERED.

22 DATED: _____

23 THE HONORABLE SUSAN ILLSTON
24 UNITED STATES DISTRICT JUDGE